BENNETT FOREST INDUSTRIES (PWS 2250056)
SOURCE WATER ASSESSMENT FINAL REPORT

February 24, 2003

State of Idaho
Department of Environmental Quality

Executive Summary

Under the Safe Drinking Water Act Amendments of 1996, all states are required by the U.S. Environmental Protection Agency (EPA) to assess every source of public drinking water for its relative sensitivity to contaminants regulated by the Act. This assessment is based on a land use inventory of the designated source water assessment area and sensitivity factors associated with the well and aquifer characteristics.

This report, *Source Water Assessment for Bennett Forest Industries (formerly Shearer Lumber Products), Elk City, Idaho,* describes the public drinking water system, the boundaries of the zones of water contribution, and the associated potential contaminant sources located within these boundaries. This assessment should be used as a planning tool, taken into account with local knowledge and concerns, to develop and implement appropriate protection measures for this source. **The results should not be used as an absolute measure of risk and they should not be used to undermine public confidence in the water system.**

The Bennett Forest Industries is a non-community, non-transient drinking water system consisting of one active ground water well (Well #2) and an inactive backup well. No locational data is provided for the backup well. Therefore, information concerning this well is not included in this report. The system currently serves 50 people through three connections. Well #2 is located approximately two miles southwest of Elk City between the South Fork of the Clearwater River and Highway 14.

Final susceptibility scores are derived from equally weighing system construction scores, hydrologic sensitivity scores, and potential contaminant/land use scores. Therefore, a low rating in one or two categories coupled with a higher rating in other categories results in a final rating of low, moderate, or high susceptibility. With the potential contaminants associated with most urban and heavily agricultural areas, the best score a well can get is moderate. Potential Contaminants/Land Uses are divided into four categories, inorganic contaminants (IOCs, e.g. nitrates, arsenic), volatile organic contaminants (VOCs, e.g. petroleum products), synthetic organic contaminants (SOCs, e.g. pesticides), and microbial contaminants (e.g. bacteria). As different wells can be subject to various contamination settings, separate scores are given for each type of contaminant.

In terms of total susceptibility, Well #2 rated high for IOCs, and moderate for VOCs, SOCs, and microbial contaminants. Detections of fluoride above the current maximum contaminant level (MCL) resulted in an automatic high susceptibility score for IOCs. System construction rated moderate and hydrologic sensitivity rated high. Land use rated moderate for IOCs, VOCs, and SOCs, and low for microbial contaminants.

The IOCs antimony and fluoride have been detected at Well #2 at levels equal to or slightly greater than their MCLs. In November 1997, antimony was detected at 6 micrograms per liter (μg/L), a level equal to the MCL. Fluoride was detected in November 1997 at 4.4 milligrams per liter (mg/L) and again in June 2001 at 4.1 mg/L, levels slightly above the MCL of 4 mg/L.

Arsenic, another IOC, was detected at high levels in Well #2. In November 1997, arsenic was detected at 28 μg/L and again in June of 2001 at 27 μg/L, levels greater than the recently revised MCL of 10 μg/L. In October 2001, the EPA lowered the arsenic MCL from 50 μg/L to 10 μg/L, giving public water systems (PWSs) until 2006 to meet the new requirement. EPA requires reporting to the Consumer Confidence Report (CCR) any detected concentrations of regulated compounds that are greater than half their MCL. Further information and health side effects can be researched at http://www.epa.gov/safewater/ccr1.html.

No VOCs or SOCs have ever been detected in the system. Trace concentrations of the IOCs barium, chromium, nitrate, selenium, and sulfate have been detected in tested water, but at concentrations significantly below the MCLs as set by the EPA. Total coliform bacteria have had no confirmatory detection. However, there have been two single detections in the distribution system and one single detection at the Well #2.

This assessment should be used as a basis for determining appropriate new protection measures or re-evaluating existing protection efforts. No matter what ranking a source receives, protection is always important. Whether the source is currently located in a "pristine" area or an area with numerous industrial and/or agricultural land uses that require surveillance, the way to ensure good water quality in the future is to act now to protect valuable water supply resources. If the system should need to expand in the future, new well sites should be located in areas with as few potential sources of contamination as possible, and the site should be reserved and protected for this specific use.

For the Bennett Forest Industries, drinking water protection activities should first focus on correcting any deficiencies outlined in the sanitary survey (an inspection conducted every five years with the purpose of determining the physical condition of a water system's components and its capacity). Actions should be taken to keep a 50-foot radius perimeter clear of all potential contaminants from around the wellhead. Any contaminant spills within the delineation should be carefully monitored and dealt with. The Bennett Forest Industries may need to implement engineering controls to reduce the amount of antimony, fluoride, and arsenic in the well. To assist PWSs in meeting the new arsenic MCL, the EPA (2002) recently released an issue paper entitled *Proven Alternatives for Aboveground Treatment of Arsenic in Ground water*.

As much of the designated protection areas are outside the direct jurisdiction of the Bennett Forest Industries, collaboration and partnerships with state and local agencies, and industry groups should be established and are critical to the success of drinking water protection. In addition, the well should maintain sanitary standards regarding wellhead protection.

Due to the time involved with the movement of ground water, drinking water protection activities should be aimed at long-term management strategies even though these strategies may not yield results in the near term. A strong public education program should be a primary focus on any drinking water protection plan as the delineation contains some urban and residential land uses. Public education topics could include proper lawn care practices, household hazardous waste disposal methods, and the importance of water conservation to name but a few. There are multiple resources available to help communities implement protection programs, including the Drinking Water Academy of the EPA. As there are transportation corridors through the delineation, the Idaho Department of Transportation should be involved in protection activities.

A community must incorporate a variety of strategies in order to develop a comprehensive drinking water protection plan, be they regulatory in nature (e.g. zoning, permitting) or non-regulatory in nature (e.g. good housekeeping, public education, specific bet management practices). For assistance in developing protection strategies please contact the Lewiston Regional Office of the Idaho Department of Environmental Quality or the Idaho Rural Water Association.

SOURCE WATER ASSESSMENT FOR BENNETT FOREST INDUSTRIES (FORMERLY SHEARER LUMBER PRODUCTS), ELK CITY, IDAHO

Section 1. Introduction - Basis for Assessment

The following sections contain information necessary to understand how and why this assessment was conducted. **It is important to review this information to understand what the rankings of this assessment mean.** Maps showing the delineated source water assessment area and the inventory of significant potential sources of contamination identified within that area are attached. The list of significant potential contaminant source categories and their rankings used to develop the assessment is also included.

Background

Under the Safe Drinking Water Act Amendments of 1996, all states are required by the EPA to assess every source of public drinking water for its relative susceptibility to contaminants regulated by the Safe Drinking Water Act. This assessment is based on a land use inventory of the delineated assessment area and sensitivity factors associated with the wells and aquifer characteristics.

Level of Accuracy and Purpose of the Assessment

Since there are over 2,900 public water sources in Idaho, there is limited time and resources to accomplish the assessments. All assessments must be completed by May of 2003. An in-depth, site-specific investigation of each significant potential source of contamination is not possible. **Therefore, this assessment should be used as a planning tool, taken into account with local knowledge and concerns, to develop and implement appropriate protection measures for this source. The results should <u>not be</u> used as an absolute measure of risk and they should <u>not be</u> used to undermine public confidence in the water system.**

The ultimate goal of the assessment is to provide data to local communities to develop a protection strategy for their drinking water supply system. The Idaho Department of Environmental Quality (DEQ) recognizes that pollution prevention activities generally require less time and money to implement than treatment of a public water supply system once it has been contaminated. DEQ encourages communities to balance resource protection with economic growth and development. The local community, based on its own needs and limitations, should determine the decision as to the amount and types of information necessary to develop a drinking water protection program. Wellhead or drinking water protection is one facet of a comprehensive growth plan, and it can complement ongoing local planning efforts.

Section 2. Conducting the Assessment

General Description of the Source Water Quality

The Bennett Forest Industries is a non-community, non-transient drinking water system consisting of one active ground water well (Well #2) and an inactive backup well. No locational data is provided for the backup well. Therefore, information concerning this well is not included in this report. The system currently serves 50 people through three connections. The active well is located approximately two miles southwest of Elk City between the South Fork of the Clearwater River and Highway 14 (Figure 1).

The IOCs antimony and fluoride have been detected at Well #2 at levels at or slightly greater than their MCLs. In November 1997, antimony was detected at 6 μg/L, a level equal to the MCL. Fluoride was detected in November 1997 at 4.4 mg/L and again in June 2001 at 4.1 mg/L, levels slightly above the MCL of 4 mg/L.

Arsenic, another IOC, was detected at high levels in Well #2. In November 1997, arsenic was detected at 28 μg/L and again in June of 2001 at 27 μg/L, levels greater than the recently revised MCL of 10 μg/L. In October 2001, the EPA lowered the arsenic MCL from 50 μg/L to 10 μg/L, giving PWSs until 2006 to meet the new requirement. EPA requires reporting to the CCR any detected concentrations of regulated compounds that are greater than half their MCL. Further information and health side effects can be researched at http://www.epa.gov/safewater/ccr1.html.

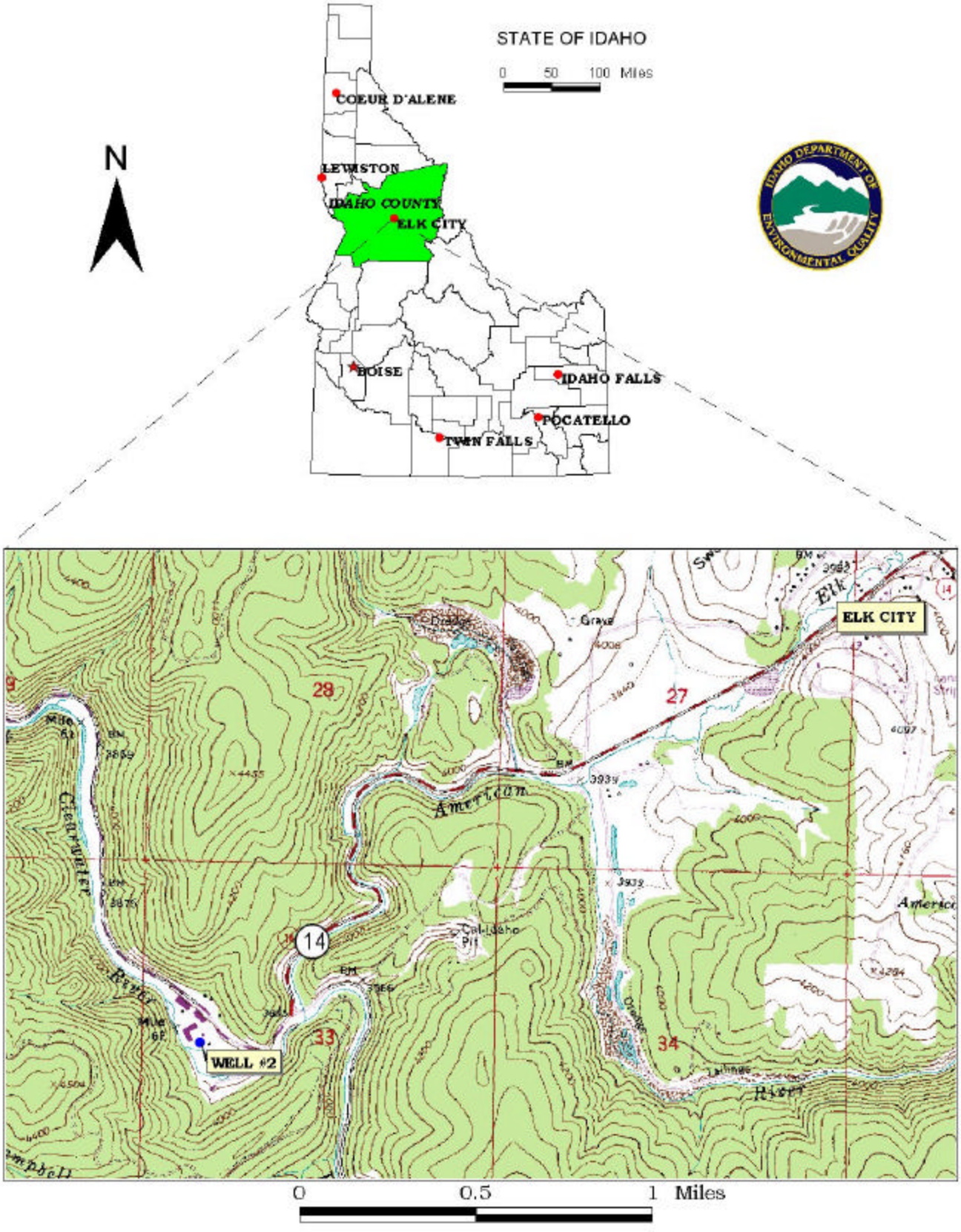
No VOCs or SOCs have ever been detected in the system. Trace concentrations of the IOCs barium, chromium, nitrate, selenium, and sulfate have been detected in tested water, but at concentrations significantly below the MCLs as set by the EPA. Total coliform bacteria have had no confirmatory detection. However, there have been two single detections in the distribution system and one single detection at Well #2.

Defining the Zones of Contribution – Delineation

The delineation process establishes the physical area around a well that will become the focal point of the assessment. The process includes mapping the boundaries of the zone of contribution into time-of-travel (TOT) zones (zones indicating the number of years necessary for a particle of water to reach a well) for water in the aquifer. DEQ contracted with the University of Idaho to perform the delineations using a refined computer model approved by the EPA in determining the 3-year (Zone 1B), 6-year (Zone 2), and 10-year (Zone 3) TOT for water in the vicinity of the Bennett Forest Industries well. The computer model used site specific data, assimilated by the University of Idaho from a variety of sources including operator input, local area well logs, and hydrogeologic reports (detailed below).

The conceptual hydrogeologic model for the Bennett Forest Industries source well near Elk City, Idaho is based on interpretation of available well logs. The source well log indicates water is derived from fractured crystalline rock. Based on the geologic map of the Elk City quadrangle at a scale of 1:250,000 (Mitchell and Bennett, 1979), the well is in metamorphosed intrusive rock. Rock described as “granite” on the source well log is probably gneiss, based upon the geologic map and experience. Reference to all non-basalt rock in the area as “granite” is a frequently-made error among drillers and road-builders in this region.

FIGURE 1. Geographic Location of Bennett Forest Industries



The ground elevation is approximately 3,880 feet above mean sea level (msl) at the Bennett Forest Industries well. Discharge from the source well is 40 gallons per minute (gpm). Little information is known about the hydrogeology of the area. A well log is available for the source.

The source location is mapped as augen gneiss (metamorphosed intrusive), surrounded by Belt Supergroup biotite gneiss. The source location is bounded on the map by a large Tertiary intrusive dike. No test points were identified in the intrusive material, so its hydraulic properties are not known; nor can it be determined whether the contact between the Tertiary intrusion and the gneiss is a no-flow boundary or not.

The Bennett Forest Industries source is located at the junction where the American and Red Rivers meet to form the South Fork of the Clearwater River. It is not known whether the rivers are gaining or losing near the source but they are believed to be gaining because they are so high in the regional topography.

No recharge data are available for the Elk City Area. Wyatt-Jaykim used a recharge value of 1 inch per year (in/yr) for the Lewiston Basin and 2 in/yr for higher elevations in the immediate vicinity of Lewiston (Wyatt-Jaykim, 1994). This location at the confluence of the American, Red, and South Fork of the Clearwater Rivers is modeled at 4 in/yr because it is several hundred feet higher, because of the significant snowpack, and because of the shallow weathered bedrock horizon.

The amount of areal recharge used in the model for the Bennett Forest Industries source is 4 in/yr.

Nearby wells were used for test points in the WhAEM simulations. Information on test points was obtained from a search of the Idaho Department of Water Resources database available on the Internet. The locations of the test points are limited to information supplied on well logs, typically the quarter-quarter section (0.25 $mile^2$). Therefore, the accuracy of the test point elevation and the static water elevation is dependent upon the accuracy of the driller's log and the topographic relief in the quarter-quarter section.

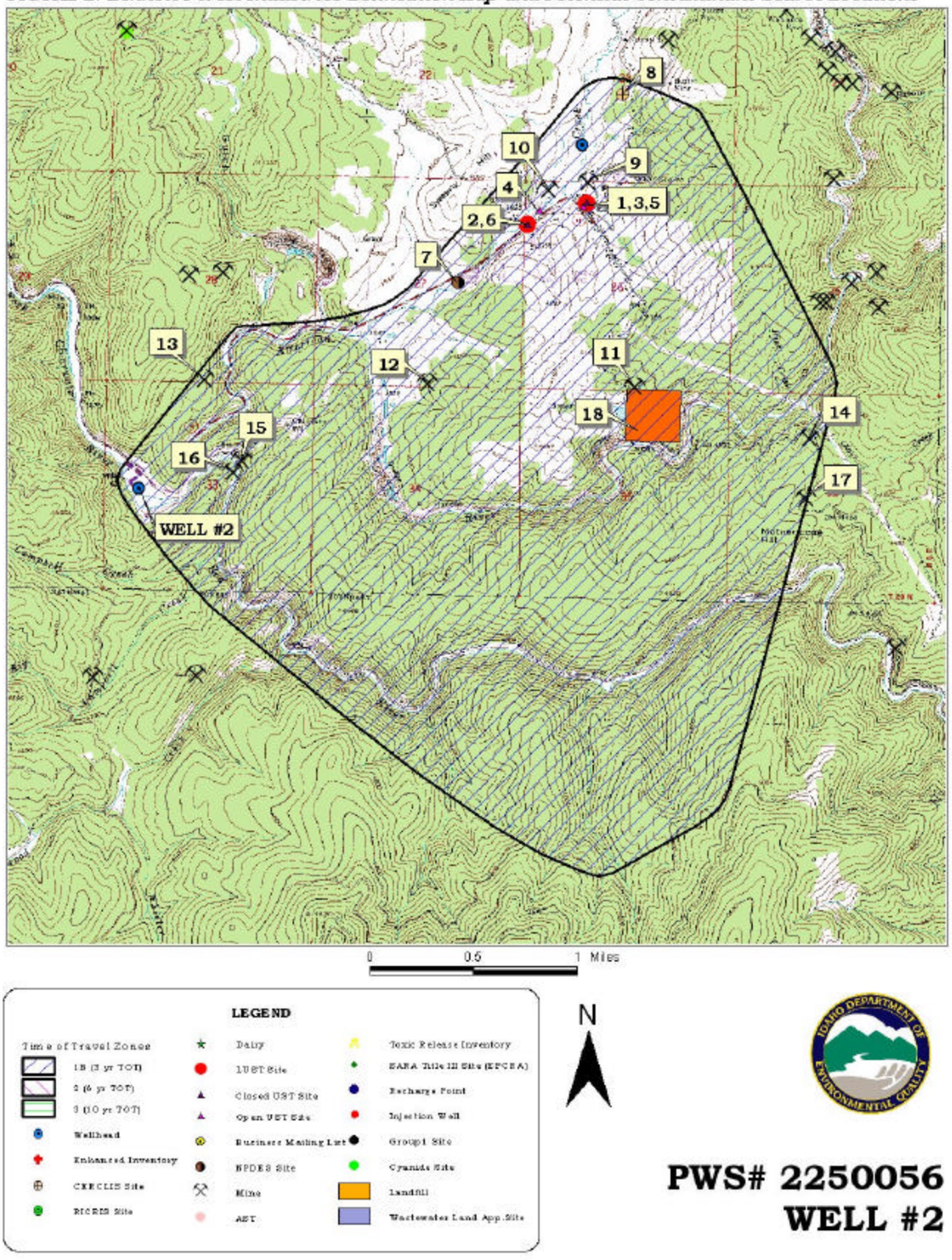
The WhAEM model using a no-flow boundary representing Tertiary intrusion is used to delineate the capture zones.

The delineated source water assessment area for Well #2 of Bennett Forest Industries only includes a 3-year TOT zone due to the model used. The delineation can best be described as a large polygonal-shaped area, encompassing Elk City to the northeast of the well, and the American, Red, and South Fork of the Clearwater Rivers to the east and south of the well (Figure 2). The actual data used by the University of Idaho in determining the source water assessment delineation area is available from DEQ upon request.

Identifying Potential Sources of Contamination

A potential source of contamination is defined as any facility or activity that stores, uses, or produces, as a product or by-product, the contaminants regulated under the Safe Drinking Water Act and has a sufficient likelihood of releasing such contaminants at levels that could pose a concern relative to drinking water sources. The goal of the inventory process is to locate and describe those facilities, land uses, and environmental conditions that are potential sources of ground water contamination. The locations of potential sources of contamination within the delineation areas were obtained by field surveys conducted by DEQ and from available databases.

FIGURE 2. Bennett Forest Industries Delineation Map and Potential Contaminant Source Locations



Land use within the immediate area and the surrounding area of the Bennett Forest Industries Well #2 contains woodland and rangeland.

It is important to understand that a release may never occur from a potential source of contamination provided they are using best management practices. Many potential sources of contamination are regulated at the federal level, state level, or both to reduce the risk of release. Therefore, when a business, facility, or property is identified as a potential contaminant source, this should not be interpreted to mean that this business, facility, or property is in violation of any local, state, or federal environmental law or regulation. What it does mean is that the potential for contamination exists due to the nature of the business, industry, or operation. There are a number of methods that water systems can use to work cooperatively with potential sources of contamination, including educational visits and inspections of stored materials. Many owners of such facilities may not even be aware that they are located near a public water supply well.

Contaminant Source Inventory Process

A two-phased contaminant inventory of the study area was conducted in May and June 2002. The first phase involved identifying and documenting potential contaminant sources within the Bennett Forest Industries source water assessment area (Figure 2) through the use of field surveys, computer databases and Geographic Information System (GIS) maps developed by DEQ. The second, or enhanced, phase of the contaminant inventory involved contacting the operator to identify and add any additional potential sources in the area.

The delineated source water assessment area of the Bennett Forest Industries Well #2 contains two leaking underground storage tanks (LUST), one underground storage tank (UST), a national pollution discharge elimination system (NPDES), a site regulated under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), several mine sites, and a closed landfill. In addition, the GIS map shows that the delineation crosses Highway 14 and three rivers: the American, Red, and South Fork of the Clearwater (Table 1). All of these potential contaminants can contribute leachable chemicals to the aquifer in the event of an accidental spill, release, or flood.

Table 1. Bennett Forest Industries, Well #2, Potential Contaminant Inventory and Land Use

Site	Description of Source[1]	TOT[2] Zone	Source of Information	Potential Contaminants[3]
1, 3, 5	LUST-Site Cleanup Incomplete, Impact: Unknown; UST-Open; UST-Closed	0-3 YR	Database Search	VOC, SOC
2, 6	LUST-Site Cleanup Incomplete, Impact: Ground Water; UST-Closed	0-3 YR	Database Search	VOC, SOC
4	UST-Open	0-3 YR	Database Search	VOC, SOC
7	NPDES-Municipal	0-3 YR	Database Search	IOC, Microbials
8	CERCLA Site	0-3 YR	Database Search	IOC, VOC, SOC
9	Mine	0-3 YR	Database Search	IOC, VOC, SOC
10	Mine	0-3 YR	Database Search	IOC, VOC, SOC
11	Mine	0-3 YR	Database Search	IOC, VOC, SOC
12	Mine	0-3 YR	Database Search	IOC, VOC, SOC
13	Mine	0-3 YR	Database Search	IOC, VOC, SOC
14	Mine	0-3 YR	Database Search	IOC, VOC, SOC
15	Mine	0-3 YR	Database Search	IOC, VOC, SOC
16	Mine	0-3 YR	Database Search	IOC, VOC, SOC
17	Mine	0-3 YR	Database Search	IOC, VOC, SOC
18	Landfill-Municipal-Closed	0-3 YR	Database Search	IOC, VOC, SOC, Microbials
	Highway 14	0-3 YR	GIS Map	IOC, VOC, SOC Microbials
	American River	0-3 YR	GIS Map	IOC, VOC, SOC Microbials
	Red River	0-3 YR	GIS Map	IOC, VOC, SOC Microbials
	South Fork of the Clearwater River	0-3 YR	GIS Map	IOC, VOC, SOC Microbials

[1] LUST = leaking underground storage tank, UST = underground storage tank, CERCLA = comprehensive environmental response compensation and liability act, NPDES = national pollution discharge elimination system
[2] TOT = time-of-travel (in years) for a potential contaminant to reach the wellhead
[3] IOC = inorganic chemical, VOC = volatile organic chemical, SOC = synthetic organic chemical

Section 3. Susceptibility Analysis

A well's susceptibility to contamination was ranked as high, moderate, or low risk according to the following considerations: hydrologic characteristics, physical integrity of the well, land use characteristics, and potentially significant contaminant sources. The susceptibility rankings are specific to a particular potential contaminant or category of contaminants. Therefore, a high susceptibility rating relative to one potential contaminant does not mean that the water system is at the same risk for all other potential contaminants. The relative ranking that is derived for each well is a qualitative, screening-level step that, in many cases, uses generalized assumptions and best professional judgement. Appendix A contains the susceptibility analysis worksheets for the system. The following summaries describe the rationale for the susceptibility ranking.

Hydrologic Sensitivity

The hydrologic sensitivity of a well is dependent upon four factors: the surface soil composition, the material in the vadose zone (between the land surface and the water table), the depth to first ground water, and the presence of a 50-foot thick fine-grained zone (aquitard) above the producing zone of the well. Slowly draining soils such as silt and clay typically are more protective of ground water than coarse-grained soils such as sand and gravel. Similarly, fine-grained sediments in the subsurface and a water depth of more than 300 feet protect the ground water from contamination.

Hydrologic sensitivity rated high for Well #2 of the Bennett Forest Industries. Area soils are moderately to highly drained and the vadose zone is composed predominantly of sand and soft granite (gneiss). Depth to first ground water is found at 178 feet below ground surface (bgs).

Well Construction

Well construction directly affects the ability of the well to protect the aquifer from contaminants. System construction scores are reduced when information shows that potential contaminants will have a more difficult time reaching the intake of the well. Lower scores imply a system is less vulnerable to contamination. For example, if the well casing and annular seal both extend into a low permeability unit, then the possibility of contamination is reduced and the system construction score goes down. If the highest production interval is more than 100 feet below the water table, then the system is considered to have better buffering capacity. If the wellhead and surface seal are maintained to standards, as outlined in sanitary surveys, then contamination down the well bore is less likely. If the well is protected from surface flooding and is outside the 100-year floodplain, then contamination from surface events is reduced. A sanitary survey was conducted in 2000 for the system.

Well #2 of the Bennett Forest Industries was constructed in 1988 to a depth of 382 feet bgs. It has a 0.250-inch thick, eight-inch diameter casing to 167 feet bgs into sand followed by a 0.250-inch thick, six-inch diameter casing set to 304 feet bgs into white chalk-like granite. The annular seal is placed at 40 feet bgs into very soft granite. The well is perforated from 250 feet to 280 feet bgs and the static water level is found at 30 feet bgs.

Well #2 rated moderate for system construction. According to the 1998 sanitary survey, the wellhead and surface seals are maintained to standards and the well is properly protected from surface flooding. The well log indicates that the highest production zone of the well is greater than 100 feet below the static water level. However, the casing and annular seal do not extend to a low permeability unit and the well does not meet the required construction standards.

Though the well may have been in compliance with standards when it was completed, current PWS well construction standards are more stringent. The Idaho Department of Water Resources *Well Construction Standards Rules* (1993) require all PWSs to follow DEQ standards as well. IDAPA 58.01.08.550 requires that PWSs follow the *Recommended Standards for Water Works* (1997) during construction. These standards include provisions for well screens, pumping tests, and casing thicknesses to name a few. Table 1 of the *Recommended Standards for Water Works* (1997) lists the required steel casing thickness for various diameter wells. An eight-inch casing requires a thickness of 0.322 inches and a six-inch casing requires a thickness of 0.280 inches. As such, Well #2 was assessed an additional point in the system construction rating.

Potential Contaminant Source and Land Use

Well #2 rated moderate for IOCs (e.g. nitrates, arsenic), VOCs (e.g. petroleum products, chlorinated solvents) and SOCs (e.g. pesticides), and low for microbial contaminants (e.g. bacteria). The numerous potential contaminant sources in the 3-year TOT zone of the delineation combined with the lower impact woodland/rangeland land use contributed to the overall potential contaminant and land use scores.

Final Susceptibility Ranking

An IOC detection above a drinking water standard MCL, any detection of a VOC or SOC, or a confirmed detection of total coliform bacteria or fecal coliform bacteria at the wellhead will automatically give a high susceptibility rating to a well despite the land use of the area because a pathway for contamination already exists. Detections of fluoride at levels above the MCL resulted in an automatic high susceptibility score for IOCs. Additionally, if there are contaminant sources located within 50 feet of the source then the wellhead will automatically get a high susceptibility rating. Hydrologic sensitivity and system construction scores are heavily weighted in the final scores. Having multiple potential contaminant sources in the 0 to 3-year time of travel zone (Zone 1B) and agricultural land contribute greatly to the overall ranking. The Bennett Forest Industries active well rated an automatic high susceptibility for IOCs and it rated moderate susceptibility for VOCs, SOCs, and microbial contaminants.

Table 2. Summary of Bennett Forest Industries Susceptibility Evaluation

Well	Susceptibility Scores[1]									
	Hydrologic Sensitivity	Contaminant Inventory				System Construction	Final Susceptibility Ranking			
		IOC	VOC	SOC	Microbials		IOC	VOC	SOC	Microbials
Well #2	H	M	M	M	L	M	H*	M	M	M

[1]H = High Susceptibility, M = Moderate Susceptibility, L = Low Susceptibility,
IOC = inorganic chemical, VOC = volatile organic chemical, SOC = synthetic organic chemical
H* = An automatic high susceptibility due to the detection of fluoride at levels above the MCL

Susceptibility Summary

The Bennett Forest Industries is a non-community, non-transient drinking water system consisting of one active ground water well (Well #2) and an inactive backup well. No locational data is provided for the backup well. Therefore, information concerning this well is not included in this report. The system currently serves 50 people through three connections. The active well is located approximately two miles southwest of Elk City between the South Fork of the Clearwater River and Highway 14 (Figure 1).

In terms of total susceptibility, Well #2 rated high for IOCs, and moderate for VOCs, SOCs, and microbial contaminants. Detections of fluoride above the current MCL resulted in an automatic high susceptibility score for IOCs. System construction rated moderate and hydrologic sensitivity rated high. Land use rated moderate for IOCs, VOCs, and SOCs, and low for microbials.

Section 4. Options for Drinking Water Protection

The susceptibility assessment should be used as a basis for determining appropriate new protection measures or re-evaluating existing protection efforts. No matter what the susceptibility ranking a source receives, protection is always important. Whether the source is currently located in a “pristine” area or an area with numerous industrial and/or agricultural land uses that require surveillance, the way to ensure good water quality in the future is to act now to protect valuable water supply resources.

For the Bennett Forest Industries, drinking water protection activities should first focus on correcting any deficiencies outlined in the sanitary survey. Actions should be taken to keep a 50-foot radius perimeter clear of all potential contaminants from around the wellhead. Any contaminant spills within the delineation should be carefully monitored and dealt with. The Bennett Forest Industries may need to implement engineering controls to reduce the amount of antimony, fluoride, and arsenic in the well. To assist PWSs in meeting the new arsenic MCL, the EPA (2002) recently released an issue paper entitled *Proven Alternatives for Aboveground Treatment of Arsenic in Ground water*.

Due to the time involved with the movement of ground water, drinking water protection activities should be aimed at long-term management strategies even though these strategies may not yield results in the near term. As there are many houses within the delineation, a strong public education program should be a primary focus of any drinking water protection plan. Public education topics could include proper lawn and garden care practices, hazardous waste disposal methods, proper care and maintenance of septic systems, and the importance of water conservation to name but a few. There are multiple resources available to help communities implement protection programs, including the Drinking Water Academy of the EPA.

A system must incorporate a variety of strategies in order to develop a comprehensive drinking water protection plan, be they regulatory in nature (e.g. zoning, permitting) or non-regulatory in nature (e.g. good housekeeping, public education, specific best management practices). For assistance in developing protection strategies please contact the Lewiston Regional Office of the DEQ or the Idaho Rural Water Association.

Assistance

Public water supplies and others may call the following DEQ offices with questions about this assessment and to request assistance with developing and implementing a local protection plan. In addition, draft protection plans may be submitted to the DEQ office for preliminary review and comments.

Lewiston Regional DEQ Office (208) 799-4370

State DEQ Office (208) 373-0502

Website: http://www.deq.state.id.us

Water suppliers serving fewer than 10,000 persons may contact Melinda Harper, mlharper@idahoruralwater.com, Idaho Rural Water Association, at 208-343-7001 for assistance with drinking water protection (formerly wellhead protection) strategies.

POTENTIAL CONTAMINANT INVENTORY
LIST OF ACRONYMS AND DEFINITIONS

AST (Aboveground Storage Tanks) – Sites with aboveground storage tanks.

Business Mailing List – This list contains potential contaminant sites identified through a yellow pages database search of standard industry codes (SIC).

CERCLIS – This includes sites considered for listing under the **Comprehensive Environmental Response Compensation and Liability Act (CERCLA)**. CERCLA, more commonly known as Superfund is designed to clean up hazardous waste sites that are on the national priority list (NPL).

Cyanide Site – DEQ permitted and known historical sites/facilities using cyanide.

Dairy – Sites included in the primary contaminant source inventory represent those facilities regulated by Idaho State Department of Agriculture (ISDA) and may range from a few head to several thousand head of milking cows.

Deep Injection Well – Injection wells regulated under the Idaho Department of Water Resources generally for the disposal of stormwater runoff or agricultural field drainage.

Enhanced Inventory – Enhanced inventory locations are potential contaminant source sites added by the water system. These can include new sites not captured during the primary contaminant inventory, or corrected locations for sites not properly located during the primary contaminant inventory. Enhanced inventory sites can also include miscellaneous sites added by the Idaho Department of Environmental Quality (DEQ) during the primary contaminant inventory.

Floodplain – This is a coverage of the 100year floodplains.

Group 1 Sites – These are sites that show elevated levels of contaminants and are not within the priority one areas.

Inorganic Priority Area – Priority one areas where greater than 25% of the wells/springs show constituents higher than primary standards or other health standards.

Landfill – Areas of open and closed municipal and non-municipal landfills.

LUST (Leaking Underground Storage Tank) – Potential contaminant source sites associated with leaking underground storage tanks as regulated under RCRA.

Mines and Quarries – Mines and quarries permitted through the Idaho Department of Lands.)

Nitrate Priority Area – Area where greater than 25% of wells/springs show nitrate values above 5 mg/L.

NPDES (National Pollutant Discharge Elimination System) – Sites with NPDES permits. The Clean Water Act requires that any discharge of a pollutant to waters of the United States from a point source must be authorized by an NPDES permit.

Organic Priority Areas – These are any areas where greater than 25 % of wells/springs show levels greater than 1% of the primary standard or other health standards.

Recharge Point – This includes active, proposed, and possible recharge sites on the Snake River Plain.

RICRIS – Site regulated under **Resource Conservation Recovery Act (RCRA)**. RCRA is commonly associated with the cradle to grave management approach for generation, storage, and disposal of hazardous wastes.

SARA Tier II (Superfund Amendments and Reauthorization Act Tier II Facilities) – These sites store certain types and amounts of hazardous materials and must be identified under the Community Right to Know Act.

Toxic Release Inventory (TRI) – The toxic release inventory list was developed as part of the Emergency Planning and Community Right to Know (Community Right to Know) Act passed in 1986. The Community Right to Know Act requires the reporting of any release of a chemical found on the TRI list.

UST (Underground Storage Tank) – Potential contaminant source sites associated with underground storage tanks regulated as regulated under RCRA.

Wastewater Land Applications Sites – These are areas where the land application of municipal or industrial wastewater is permitted by DEQ.

Wellheads – These are drinking water well locations regulated under the Safe Drinking Water Act. They are not treated as potential contaminant sources.

NOTE: Many of the potential contaminant sources were located using a geocoding program where mailing addresses are used to locate a facility. Field verification of potential contaminant sources is an important element of an enhanced inventory.

Where possible, a list of potential contaminant sites unable to be located with geocoding will be provided to water systems to determine if the potential contaminant sources are located within the source water assessment area.

References Cited

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Appendix A

Bennett Forest Industries Susceptibility Analysis Worksheet

The final scores for the susceptibility analysis were determined using the following formulas:

1) VOC/SOC/IOC Final Score = Hydrologic Sensitivity + System Construction + (Potential Contaminant/Land Use x 0.27)

2) Microbial Final Score = Hydrologic Sensitivity + System Construction + (Potential Contaminant/Land Use x 0.375)

Final Susceptibility Scoring:

0 - 5 Low Susceptibility

6 - 12 Moderate Susceptibility

$\geq$ 13 High Susceptibility

Ground Water Susceptibility Report Public Water System Name : BENNETT FOREST INDUSTRIES Well# : WELL #2

Public Water System Number 2250056 12/9/02 8:17:52 AM

1. System Construction		SCORE			
Drill Date	3/23/1988				
Driller Log Available	YES				
Sanitary Survey (if yes, indicate date of last survey)	YES	1998			
Well meets IDWR construction standards	NO	1			
Wellhead and surface seal maintained	YES	0			
Casing and annular seal extend to low permeability unit	NO	2			
Highest production 100 feet below static water level	YES	0			
Well located outside the 100 year flood plain	YES	0			
	Total System Construction Score	3			
2. Hydrologic Sensitivity					
Soils are poorly to moderately drained	NO	2			
Vadose zone composed of gravel, fractured rock or unknown	YES	1			
Depth to first water > 300 feet	NO	1			
Aquitard present with > 50 feet cumulative thickness	NO	2			
	Total Hydrologic Score	6			
3. Potential Contaminant / Land Use - ZONE 1A		IOC Score	VOC Score	SOC Score	Microbial Score
Land Use Zone 1A	RANGELAND, WOODLAND, BASALT	0	0	0	0
Farm chemical use high	NO	0	0	0	
IOC, VOC, SOC, or Microbial sources in Zone 1A	YES	YES	NO	NO	NO
	Total Potential Contaminant Source/Land Use Score - Zone 1A	0	0	0	0
Potential Contaminant / Land Use - ZONE 1B					
Contaminant sources present (Number of Sources)	YES	16	18	18	6
(Score = # Sources X 2) 8 Points Maximum		8	8	8	8
Sources of Class II or III leacheable contaminants or	YES	16	18	18	
4 Points Maximum		4	4	4	
Zone 1B contains or intercepts a Group 1 Area	NO	0	0	0	0
Land use Zone 1B	Less Than 25% Agricultural Land	0	0	0	0
	Total Potential Contaminant Source / Land Use Score - Zone 1B	12	12	12	8
Cumulative Potential Contaminant / Land Use Score		12	12	12	8
4. Final Susceptibility Source Score		12	12	12	12
5. Final Well Ranking		High	Moderate	Moderate	Moderate